

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

BECTON, DICKINSON AND COMPANY,  
GENEOHM SCIENCES CANADA, INC.  
and HANDYLAB, INC.,

Plaintiffs,

v.

NEUMODX MOLECULAR, INC.,  
QIAGEN GMBH, QIAGEN NORTH  
AMERICAN HOLDINGS, INC.,  
SUNDARESH  
BRAHMASANDRA, and JEFFREY  
WILLIAMS,

Defendants.

C.A. No. 19-cv-1126-LPS

**DEFENDANTS JEFFREY WILLIAMS AND SUNDARESH BRAHMASANDRA'S  
MOTION TO DISMISS PURSUANT TO RULE 12(B)(3) FOR LACK OF VENUE**

Pursuant to Federal Rule 12(b)(3), Defendants Jeffrey Williams and Sundares  
Brahmasandra move to dismiss for improper venue recently the filed "Counterclaims-In-Reply"  
Count Nos. 1, 2 and 7-10 asserted against one or both of them for alleged trade secret  
misappropriation, breach of contract, and other torts. Defendants Williams and Brahmasandra  
respectfully request that the Court dismiss Counts 1, 2 and 7-10 against them, and that the Court  
dismiss them as parties from this lawsuit because there is no venue over them in Delaware. This  
motion is accompanied by an opening describing the basis for the requested relief.

Dated: May 13, 2021

Respectfully submitted,

*Of Counsel:*

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